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COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA JIMENEZ,

Plaintiff,

v.

GEICO GENERAL INSURANCE
COMPANY, an entity licensed to do business
in the State of Nevada; DOES I through V;
and BUSINESS ENTITIES VI through X,
inclusive,

Defendants.

Case No. 2:19-cv-00984-APG-VCF

**STIPULATION AND ORDER TO
EXTEND THE PRE-TRIAL ORDER
DEADLINE (FIRST REQUEST)**

Defendant GEICO General Insurance Company (“GEICO”), by and through its attorneys of record of the law firm McCormick, Barstow, Sheppard, Wayte, & Carruth LLP, and Plaintiff Maria Jimenez (“Plaintiff”), by and through her attorneys of record of the law firm Greenman Goldberg Raby & Martinez, hereby file this Stipulation and Order to Extend the Pre-Trial Order Deadline (First Request), specifically seeking to extend the deadline by 90 days.

IT IS HEREBY STIPULATED AND AGREED between the parties to extend the joint pre-trial order deadline of June 11, 2020. In accordance with Local Rule 26-4, the parties state as follows:

I. DISCOVERY COMPLETED BY THE PARTIES:

The parties have served their initial disclosures. Both parties have propounded and answered written discovery. Plaintiff's deposition testimony was provided on February 6, 2020.

II. DISCOVERY WHICH REMAINS TO BE COMPLETED:

For all intents and purposes, discovery has concluded and the parties merely seek to extend the deadline to submit the joint pre-trial order.

III. REASON WHY DISCOVERY WAS NOT SATISFIED OR COMPLETED WITHIN THE TIME LIMIT SET BY THE DISCOVERY PLAN:

As noted above, the parties have been working diligently throughout the discovery process and discovery has effectively concluded but for the joint pre-trial order. The parties now seek to submit this matter to private mediation in an effort to reach a settlement. However, in light of the recent COVID-19 pandemic, scheduling has become more tenuous. The parties seek to have the pre-trial order deadline stayed until such time as a mediation is able to proceed.

IV. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION

The instant stipulation is submitted within the timeframe outlined by LR II 26-4. As stated above, there have been certain unforeseeable and unavoidable obstacles with calendaring presented by the onset of the COVID-19 pandemic and both the federal and state governments declaring a state of emergency. However, the parties are of the position that a 90 day extension of the joint pre-trial order deadline is a reasonable amount of time to permit a mediation to go forward.

V. THE CURRENT SCHEDULE FOR COMPLETION OF ALL REMAINING DISCOVERY:

The parties request that the pertinent discovery deadlines set forth in the Court's Scheduling Order be continued ninety (90) days, as follows:

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1 A. PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders, the
2 joint pretrial order shall be filed ninety (90) days from its current deadline of June 11, 2020, but not
3 later than September 9, 2020.

4 DATED this 22nd day of May, 2020

5 GREENMAN GOLDBERG RABY & MARTINEZ

6 By /s/ Breen Arntz

7 Gabriel A Martinez, Nevada Bar No. 326
8 Dillon G. Coil, Nevada Bar No. 11541
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12 Tel. (702) 384-1616

13 Attorneys for Maria Jimenez

14 DATED this 22nd day of May, 2020

15 McCORMICK, BARSTOW, SHEPPARD,
16 WAYTE & CARRUTH LLP

17 By /s/ Jonathan W. Carlson

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19 Jonathan W. Carlson, Nevada Bar No. 10536
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23 Tel. (702) 949-1100

24 Attorneys for Geico General Insurance Company

25 **ORDER**

26 **IT IS SO ORDERED.**

27 DATED this 27th day of May, 2020

28 By 

UNITED STATES MAGISTRATE JUDGE

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